

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 23-mj-1180
(FILED UNDER SEAL)

PAUL RASLAWSKY a/k/a "PJ"

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about March 1, 2021, in the Western District of New York, the defendant, **PAUL RASLAWSKY a/k/a "PJ"**, then being an unlawful user of Schedule II controlled substance, did knowingly possess in and affecting commerce a firearm. Specifically, a black American Tactical Omni rifle, bearing serial number NS089343, in violation of Title 18, United States Code, Section 922(g)(3).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

**BRENDAN
O'CONNOR**

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O'CONNOR
Date: 2023.11.29 16:18:12
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Complainant's signature

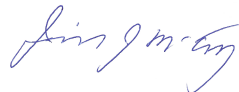
Brendan F. O'Connor
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Printed name and title

Sworn to and signed telephonically.

Date: November 29, 2023

City and State: Buffalo, New York



Judge's signature

HONORABLE JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, **Brendan F. O'Connor**, Special Agent of the Federal Bureau of Investigation (FBI),
United States Department of Justice, having been duly sworn, states as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the FBI. As such, I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. I have served as an FBI Special Agent since October of 2022. During that time, I have participated in investigations involving drug trafficking, gun possession, and organized crime matters. In addition, I have had the opportunity to work with several other FBI agents and other law enforcement agents and officers of varying experience levels, who have also investigated firearms possession and drug trafficking networks, with regard to the manner in which controlled substances are obtained, diluted, packaged, distributed, sold and used within the framework of drug trafficking in the Western District of New York. My investigative experience detailed herein, and the experiences of other law enforcement agents, who are

participating in this investigation, serve as the basis for the opinions and conclusions set forth herein.

3. This affidavit is being submitted for a limited purpose, that is, a probable cause determination, therefore I have not presented all the facts of this investigation to date. I have set forth only the information I believe to be necessary to establish probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel. This affidavit is intended to show merely that there is sufficient probable cause and does not set forth all of my knowledge about this matter.

4. I make this affidavit in support of a criminal complaint charging **PAUL RASLAWSKY a/k/a "PJ"** with a violation of Title 18, United States Code, Section 922(g)(3) (Unlawful User of Controlled Substances in Possession of a Firearm).

PROBABLE CAUSE

5. On February 22, 2021, Cheektowaga Police Department (CPD) Officers initiated a traffic stop on a 2015 red Chevrolet Silverado Pickup, bearing NY license plate EVU3535, registered to **RASLAWSKY**, after the vehicle failed to utilize a turn signal. The CPD Officers identified **RASLAWSKY** as the driver and sole occupant of the vehicle. After approaching the vehicle, the CPD Officers detected the odor of marijuana emanating from inside **RASLAWSKY's** vehicle. CPD Officers then asked **RASLAWSKY** to exit the vehicle.

At that time, a small amount of methamphetamine¹ was located inside a folded dollar bill in **RASLAWSKY's** wallet. **RASLAWSKY** was arrested for a violation of New York State Penal Code 220.03 (Criminal Possession of a Controlled Substance) and issued a summons for violations of Vehicle and Traffic laws.

SEARCH WARRANT EXECUTION OF 19 GRATTAN STREET

6. On March 1, 2021, FBI Safe Streets Task Force (SSTF) executed a federal search warrant issued by the Honorable Michael J. Roemer, United States Magistrate Judge, for **RASLAWSKY's** residence, located at 19 Grattan Street, Cheektowaga, New York. Among several firearms recovered were one (1) black American Tactical Omni AR-15 style rifle, bearing serial number NS089343, along with five (5) associated high-capacity magazines, including one (1) 60-round drum magazine, all depicted below, found in the lower portion of the residence:



¹ The methamphetamine's chemical structure was confirmed via laboratory testing.

Additionally, and among other items, the following were recovered: Suspected marijuana edibles in a Ziplock bag; a silver container holding a green leafy substance, suspected to be marijuana; mail addressed to “**PAUL RASLAWSKY**”; and an Outlaws Motorcycle Club vest.²

7. **RASLAWSKY** was interviewed by Special Agents of the FBI while being detained during the search warrant execution of his residence. **RASLAWSKY** advised the agents that **RASLAWSKY** recreationally uses methamphetamine. **RASLAWSKY** explained that he “snorts” the methamphetamine, which he purchases from an individual on an Indian Reservation. **RASLAWSKY** also stated that he is a member of the Outlaws Motorcycle Club. **RASLAWSKY** then told agents that he owns numerous firearms, which he stores in his residence, including an AR-15-style rifle which he kept in the lower portion of the residence.

8. Following the completion of the search warrant, **RASLAWSKY** was released from the investigative detention, and the evidence was transported to and maintained inside of the FBI-Buffalo Evidence Control Room.

9. **WHEREFORE**, based upon the foregoing, I respectfully submit that there is probable cause to believe that **PAUL RASLAWSKY, a/k/a “PJ”**, did knowingly, willfully, and unlawfully violate Title 18, United States Code, Section 922(g)(3) (Unlawful User of

² Your Affiant is aware that the Outlaws Motorcycle Club has been identified by the Department of Justice as an Outlaw Motorcycle Gang and transnational criminal organization.

Controlled Substances in Possession of a Firearm). Accordingly, Your Affiant requests that a Criminal Complaint and Arrest Warrant be issued, and that the Criminal Complaint and this affidavit be sealed based on a continuing investigation and further Order of this Court.

BRENDAN
O'CONNOR

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O'CONNOR
Date: 2023.11.29 16:20:37
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BRENDAN F. O'CONNOR
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed telephonically
this 29th day of November, 2023.



HONORABLE JEREMIAH J. MCCARTHY
United States Magistrate Judge